Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Virginia Cellular, LLC	)	
	)	CC Docket No. 96-45
Petition for Designation as an	)	
Eligible Telecommunications Carrier	)	
in the Commonwealth of Virginia	)	

To: The Commission

REPLY TO OPPOSITION

Virginia Cellular, LLC ("Virginia Cellular"), by its attorneys and pursuant to Section 1.106(h) of the Commission's rules, 47 C.F.R. § 1.106(h), hereby files its Reply to NTELOS' Opposition to Petitions for Reconsideration, filed on March 9, 2004 ("Opposition"). As set forth below, the Opposition was untimely filed and provides no valid arguments in response to Virginia Cellular's ample demonstration of reasons why portions of the *Order*[1] should be reversed.

I. The Opposition Was Not Timely Filed

Section 1.106 of the Commission's rules states that an opposition to a petition for reconsideration must be filed within 10 days after the petition is filed. 47 C.F.R. § 1.106(g). Virginia Cellular and the other petitioners for reconsideration filed their petitions on Monday, February 23, 2004. Counting from that date, the tenth day fell on Thursday, March 4. Adding the three-day allowance for service by mail, *see* 47 C.F.R. § 1.4(h), and in accordance with the rule to proceed to the next business day if a deadline falls on a weekend, *see* 47 C.F.R. § 1.4(j), the latest permissible date for NTELOS to file an opposition was Monday, March 8. Yet, NTELOS did not do so until Tuesday, March 9.

[1] *Virginia Cellular, LLC*, 31 Comm. Reg. (Pike & Fischer) 586 (rel. Jan. 22, 2004) ("*Order*").

We do not have the benefit of an explanation from NTELOS as to why it believes its Opposition to be timely, or why it should be accepted despite its late filing. If NTELOS was relying on the timetable set forth in Section 1.429 of the Commission's rules – which permits the filing of an opposition within 15 days after the petition for reconsideration is placed on Public Notice – NTELOS' reliance was misplaced: Section 1.429 only applies to rulemaking proceedings in which the Commission issues a notice of proposed rulemaking, solicits public comment, and publishes the final rules in the Federal Register. *See* 47 C.F.R. §§ 1.411-1.429. In the proceeding that led to the designation of Virginia Cellular as an ETC, the Commission did not issue a notice of proposed rulemaking, and it did not publish final rules.[2] Rather, it engaged in an adjudication regarding an individual company.[3] Accordingly, the applicable deadlines are those set forth in Section 1.106 of the rules, including the 10-day filing period for oppositions.

Because NTELOS failed to file its Opposition in a timely manner, the Opposition should be dismissed.

II. NTELOS Relies on Yet-to-be Adopted Rule Changes in Disregard of Existing Commission Rules and Precedent

In its Petition, Virginia Cellular explained in detail how the Commission's decision departed from precedent without explanation, and how it purported to adopt new standards without going through the requisite rulemaking channels. *See* Petition at pp. 2-8. Specifically, Virginia Cellular showed how the *Order* contradicted the Commission's previous repeated commitment to competitive neutrality, as well as multiple Commission orders emphasizing that a petitioner can

[2] The Commission also did not afford public notice of the filing of Virginia Cellular's Petition for Reconsideration ("Petition).

[3] *See RCC Holdings, Inc.*, 17 FCC Rcd 23532, 23545 (2002) ("*RCC Holdings*") (recon. pending) ("We recognize that these parties raise important issues regarding universal service high-cost support. We find, however, that these concerns are beyond the scope of this Order, which considers whether to designate a particular carrier as an ETC.").

make a threshold public interest showing which must be refuted with specific demonstrations based on more than sparse population, challenging geography, or other characteristics that are "typical of most rural areas."[4] *See id.* Virginia Cellular also explained how the *Order* directly contradicted the Commission's previous conclusion that, to the extent a petitioner can only serve a portion of a rural ILEC's study area, "cream skimming" concerns are "substantially eliminated" by the rural ILEC's "option of disaggregating and targeting high-cost support below the study area level."[5] *See id.* at pp. 3-4.

In response, NTELOS provides *absolutely nothing* to refute Virginia Cellular's contention that the *Order* violated the Commission's rules and settled precedent. Instead, implicitly conceding that point, NTELOS uses as "authority" the recent recommendations of the Federal-State Joint Board on Universal Service ("Joint Board") – released nearly two months after the *Order* was adopted – setting forth, *inter alia*, proposed new standards for evaluating competitive ETC ("CETC") petitions and service area redefinition requests.[6] The Joint Board's recommendations, however, cannot serve as a justification for the Commission's action in this case.

NTELOS incorrectly assumes that the proposed standards articulated in the *Joint Board Recommendation* may be applied as if they were formally adopted rules. On the contrary, unless and until they are adopted, the Joint Board's recommendations remain just that – recommendations. Even if the portions of the *Joint Board Recommendation* cited by NTELOS do become encoded in the Commission's rules, the application of those rules to a pending proceeding can only occur after

---

[4] *See Western Wireless Corp.*, 16 FCC Rcd 48, 55 (2000) ("*Western Wireless*"). *See also Western Wireless Corp.*, 16 FCC Rcd 19144, 19149 (2001) ("*Western Wireless Recon. Order*"); *Western Wireless Corp.*, 16 FCC Rcd 18133, 18137-39 (2001) ("*Pine Ridge*"); *Guam Cellular and Paging, Inc. d/b/a Guamcell Communications*, 17 FCC Rcd 1502, 1508-09 (2002) ("*Guamcell*").

[5] *Western Wireless Recon. Order, supra*, 16 FCC Rcd at 19149.

[6] *Federal-State Joint Board on Universal Service*, FCC 04J-1 (Jt. Bd. rel. Feb. 27, 2004) ("*Joint Board Recommendation*").

those rules have been formally adopted.[7] Indeed, the application of yet-to-be adopted rules to ongoing proceedings would allow agencies to short-circuit the rulemaking process required by the Administrative Procedure Act and apply arbitrary standards that have not withstood the rigors of public comment. Until the Commission considers the Joint Board's recommendations, solicits public comment, and adopts new rules, it is bound by its existing rules and precedent. In the absence of new rules, the Commission was required to "provide a reasoned explanation for any failure to adhere to its own precedents." *Hatch v. FERC*, 654 F.2d 825, 834 (D.C. Cir. 1981). The *Order* contained no adequate explanation of its departure from its previous ETC orders, *see* Petition at pp. 5-7, and NTELOS makes no attempt to identify one.

Similarly, NTELOS fails to distinguish the facts of Virginia Cellular's case from prior cases in which ETC status was granted throughout the requested area. Although NTELOS claims that the *Order* was based on the "specific situation" in Virginia and the proposed ETC service area, NTELOS fails to state just what that situation is. As Virginia Cellular stated in its Petition, the Commission's denial of ETC status in the Waynesboro wire center was based solely on the supposition that designating a CETC in an area with certain population density characteristics "could potentially" harm the incumbent. *Order* at para. 35. This "situation", as the FCC has previously emphasized, is typical of most rural areas and cannot serve as a basis for denying ETC status in whole or in part. *See Western Wireless Recon. Order, supra,* 16 FCC Rcd at 19152. To the extent the "specific situation" NTELOS refers to is the fact that Virginia Cellular's FCC-licensed service area does not encompass the entirety of some ILECs' study area, such a situation is hardly unique to Virginia and has not prevented the FCC and numerous state commissions from designating CETCs

---

[7] *Boston Edison Co. v. Federal Power Comm'n,* 557 F.2d 845, 849 (D.C. Cir. 1977) (agency action was arbitrary and capricious where agency required applicants to submit evidence in accordance with filing requirements that had been proposed but not yet adopted).

throughout their licensed service areas.[8]

In sum, NTELOS can point to no statute, rule, or binding decision that refutes Virginia Cellular's showing that the *Order* violated existing rules and precedent.

III. The Commission Must Reject NTELOS' Request for an Ad Hoc Invalidation of the Disaggregation Framework Achieved by the Rural Task Force, the Joint Board, and the ILECs Themselves

As Virginia Cellular explained in its Petition, the Commission has previously held that, when a wireless carrier covers only a portion of a rural ILEC's study area, any concerns regarding "cream skimming" or uneconomic levels of support are "substantially eliminated" by the ILEC's "option of disaggregating and targeting support below the study area level so that support will be distributed in a manner that ensures that the per-line level of support is more closely associated with the cost of providing service." *Western Wireless Recon. Order, supra,* 16 FCC Rcd at 19149. Indeed, when per-line support levels are more accurately targeted to relatively high- and low-cost areas, it matters not where a CETC enters. This "furthers the goals of the [Telecommunications Act of 1996] by benefiting the highest cost rural customers and enabling competitive market entry."[9] For this reason, the Commission has opined that, "as a general matter, support should be disaggregated and targeted below the study area level". *Federal-State Joint Board on Universal Service*, 16 FCC Rcd 11244, 11302 (2001) ("*RTF Order*"). The utility of disaggregation as a means to "eliminate. . .economic

---

[8] *See, e.g., RCC Holdings, supra*; *Cellular South License, Inc.*, 17 FCC Rcd 24393 (2002) (recon. pending); Smith Bagley, Inc., Docket No. T-02556A-99-0207 (Ariz. Corp. Comm'n Dec. 15, 2000); N.E. Colorado Cellular, Inc., Docket Nos. 00A-315T and 00A-491T (Colo. PUC Dec. 21, 2001); RCC Minnesota, Inc. et al., Docket No. 2002-344 (Maine PUC, May 13, 2003) ("RCC Maine Order"); ALLTEL Communications, Inc., Case No. U-13765 (Mich. PSC Sept. 11, 2003) ("ALLTEL Michigan Order"); Midwest Wireless Communications, LLC, Docket No. PT-6153/AM-02-686 (Minn. PUC, March 19, 2003) ("Midwest Minnesota Order"); Smith Bagley, Inc., Utility Case No. 3026, Recommended Decision of the Hearing Examiner and Certification of Stipulation (Aug. 14, 2001), *aff'd,* Final Order (N.M. Pub. Reg. Comm. Feb. 19, 2002); Highland Cellular, Inc., Case No. 01-1604-T-PC (W.V. PSC May 10, 2002) ("Highland West Virginia Order"); United States Cellular, Docket No. 8225-TI-102 (mailed Dec. 20, 2002) ("U.S. Cellular Wisconsin Order").

[9] "Disaggregation and Targeting of Universal Service Support," RTF White Paper #6 (September 2000) at p. 6, available at http://www.fcc.gov/wcb/universal_service/whitepaper6.doc.

distortions", *id.* at 11300, led to the broad consensus among RTF participants – including rural ILECs – to adopt an administratively simple mechanism for rural ILECs to disaggregate support. NTELOS chose not to disaggregate. *See* Opposition at p. 5. Now, based on the apparently uneconomic per-line support levels resulting from its choice, NTELOS supports the denial of ETC status to a competitor in a portion of its service area. Thus, NTELOS has effectively disavowed the very mechanism rural ILECs supported as part of the compromises that formed the RTF plan.

By insisting that disaggregation is "a burdensome, costly process the effects of which on the rural companies are still not completely clear", Opposition at p. 5, NTELOS ignores the fact that the Commission already considered the burdens associated with disaggregation and nonetheless expressed a general preference for disaggregating support below the study-area level. Even assuming NTELOS could show significant burdens associated with disaggregation, such burdens are outweighed by the benefits of eliminating arbitrage opportunities and encouraging competitive entry. *See RTF Order, supra,* 16 FCC Rcd at 11302. Moreover, NTELOS' unsubstantiated claim that disaggregation is "burdensome" and "costly" contradicts other ILECs that are on record as stating that disaggregation does not impose significant costs.[10]

NTELOS' characterization of the Joint Board's 1997 *Recommended Decision* as establishing a "presumption that rural telephone study areas should not be disaggregated", Opposition at p. 2, is wrong, for two reasons. First, the statute gives redefinition authority to the FCC and the states, not to

---

[10] *See, e.g.*, RCC Maine Order, *supra*, at p. 10 (questioning an ILEC association's claim that disaggregation is burdensome given that an ILEC intervenor had acknowledged that "disaggregation itself did not impact [its] bottom line."); In the Matter of Petition by the Public Utilities Commission of the State of Colorado, Pursuant to 47 CFR § 207(c), for Commission Agreement in Redefining the Service Area of CenturyTel of Eagle, Inc., a Rural Telephone Company, CC Docket No. 96-45, Comments of CenturyTel of Eagle, Inc. at p. 3 (filed Sept. 13, 2002) ("Although CenturyTel was able to calculate relative cost down to the wire center. . .support was established based on two support zones[.]"). *See also* ALLTEL Michigan Order, *supra*, at p. 15 ("[D]esignating service areas utilizing entire exchanges will minimize the administrative burden on rural telephone companies to calculate costs at something other than a study area level. This approach will require affected ILECs to disaggregate into service areas that are coterminous with existing telecommunications boundaries for which

the Joint Board, whose recommendations are to be merely "tak[en] into account". 47 U.S.C. § 214(e)(5). Although the Joint Board advised against a wholesale definition of "service area" differing from ILEC study areas, the Joint Board's discussion provides a useful decisional framework for evaluating individual requests for service area redefinition, a process expressly envisioned under Section 214(e)(5) of the Act. *Federal-State Joint Board on Universal Service*, 12 FCC Rcd 8776, 8881 (1997) ("*First Report and Order*").

Second, both the FCC and numerous state commissions have recognized that the adoption of the Commission's disaggregation rules changed the legal landscape for redefinition requests by fully resolving any concerns that competitors may receive uneconomic levels of support.[11] The Wisconsin Public Service Commission ("PSC") aptly stated this conclusion in a recent order designating a wireless provider as an ETC throughout its licensed service area:

> Originally, there were concerns about 'cherry picking' or 'cream skimming.' At that time, the USF support was averaged across all lines served by a provider within its study area. . .As a result, the FCC found that unless otherwise approved by both the state and the FCC, a competitor seeking ETC status in the territory of a rural company must commit to serving the entire territory. ***However, since that time, the USF funding mechanisms have changed. . .An ILEC has the option to target the federal high-cost assistance it receives so that it receives more USF money per line in the parts of the territory where it costs more to provide service, and less federal USF money per line in the parts of the territory where it costs less to provide service.*** Since the competitive ETC receives the same per line amount as the ILEC, if it chooses to only serve the lower cost parts of the territory, then it receives only the lower amount of federal USF money. ***As a result, as recognized by the FCC, the concerns about "cherry picking" and "cream skimming" are largely moot.***[12]

---

costs are already calculated.")

[11] *See, e.g., Western Wireless Recon. Order*, *supra,* 16 FCC Rcd at 19149; RCC Maine Order, *supra,* at p. 10-11; ALLTEL Michigan Order, *supra,* at p. 15; Midwest Minnesota Order, *supra,* at pp. 13-14; Highland West Virginia Order, *supra,* slip op. at p. 92; U.S. Cellular Wisconsin Order, *supra,* at p. 11.

[12] NCPR, Inc, d/b/a Nextel Partners, Docket No. 8081-T1-101 at pp. 10-11 (Wisc. PSC Sept. 30, 2003) (emphasis added, citations omitted) ("Nextel Wisconsin Order"). *See also* In re the Matter of NECC's Application to Re-define the Service Area of Eastern Slope Rural Telephone Association, Inc., Great Plains Communications, Inc., Plains Coop Telephone Association, Inc. and Sunflower Telephone Co., Inc.,

The Wisconsin PSC also recognized that, even where an ILEC has chosen not to disaggregate support, the ***option*** to disaggregate is sufficient to dispel concerns that uneconomic levels of support may be received:

> Some of the companies in whose territory Nextel is seeking ETC designation have disaggregated and targeted USF support, and some have not. However, the [PSC] may allow a company to change paths when a competitive ETC is designated in a rural company's territory.[13]

Given the administrative ease and undeniable benefits of disaggregating and targeting support, NTELOS' concerns regarding "[c]ream-skimming in the Waynesboro wire center", Opposition at p. 6, are unfounded.

IV. NTELOS Advocates an Approach that Violates Competitive Neutrality and Harms Rural Consumers

Virginia Cellular could not agree more with NTELOS' statement that:

> [t]he core purpose of universal service support has always been and continues to be to help telephone companies in high-cost areas to make the investments in the infrastructure and assure that rural customers have reasonably-priced, quality telecommunications.

Opposition at p. 6. NTELOS is wrong, however, in stating that disaggregation is "for the convenience of Virginia Cellular" and would "endanger that core purpose." *Id.* at pp. 6, 7. As we understand the Opposition, NTELOS believes the no-disaggregation choice to be a useful tool in keeping competition out, and that the "core purpose" of universal service is to protect ILECs. This pre-1996 view of universal service was decisively rejected by the Fifth Circuit, which held that "[t]he Act only promises universal service, and that is a goal that requires sufficient funding of

---

Recommended Decision, Docket No. 02A-444T at ¶ 85 (Colo. ALJ, May 23, 2003) (ILEC's "cream skimming" arguments were "founded on superseded FCC policies" and "ignore[d] the evolution of universal service policy embodied in the *[RTF] Order*.")

[13] Nextel Wisconsin Order, *supra*, at p. 11.

customers, not *providers*." *Alenco Communications, Inc. v. FCC*, 201 F.3d 608, 620 (5th Cir. 2000) (emphasis in original). Denying ETC status based on "cream skimming" concerns associated with an ILEC's Path 1 filing provides the ILEC with artificial protection and arbitrarily denies a competitor the ability to receive the same types of subsidies the ILEC does.[14] This is fundamentally at odds with the Commission's obligation to uphold universal service policies that are competitively neutral.[15]

Moreover, NTELOS fails to recognize that denying ETC status based on a rural ILEC's failure to disaggregate harms rural consumers. First, the denial of ETC status in Waynesboro will deny Lifeline and Link-up support to many low-income consumers who, as a result, will not be able to benefit from mobile service offerings that "can mitigate the unique risks of geographic isolation associated with living in rural communities." *Order* at ¶ 29. Second, the selective denial favored by NTELOS will virtually guarantee that appropriate levels of support will ***not*** go to areas that need it. If another competitor is designated as an ETC in a relatively high-cost portion of NTELOS' service area, the support levels would reflect study area-wide costs and therefore would likely be insufficient to fund infrastructure development in that area. Similarly, consumers in Shenandoah Telephone Company's ("Shentel") Bergton wire center, where Virginia Cellular received ETC status, will not have the benefit of sufficient support because Shentel similarly declined to disaggregate, leaving an extremely high-cost area with woefully inadequate levels of support. Surely, this cannot be what Congress intended.

When faced with a request for CETC designation in a portion of a non-disaggregated service

---

[14] *See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, 11 FCC Rcd 15499, 15506-07 (1996), *subsequent history omitted* ("The present universal service system is incompatible with the statutory mandate to introduce efficient competition into local markets, because the current system distorts competition in those markets. For example, without universal service reform, facilities-based entrants would be forced to compete against monopoly providers that enjoy not only the technical, economic, and marketing advantages of incumbency, but also subsidies that are provided only to the incumbents.")

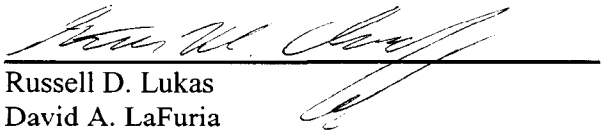
[15] *See First Report and Order, supra*, 12 FCC Rcd at 8801-02 ("competitive neutrality means universal service support mechanisms and rules neither unfairly advantage nor disadvantage one provider over another, and

area, the Commission's clear policy choice should be to grant the CETC's request. The affected ILEC may then decide whether it is appropriate to disaggregate support, or the state commission may institute a proceeding to compel such disaggregation if necessary. *See* 47 C.F.R. § 54.315(b)(1). In denying ETC status in NTELOS' service area outright, the Commission made no factual determination of the relative costs of serving different wire centers, something that NTELOS is in the best position to know. NTELOS and the Virginia State Corporation Commission should have been allowed to make a post-grant determination of whether support should be disaggregated to eliminate concerns that uneconomic support might be received. By selectively declining ETC designation based on conditions created by NTELOS' Path 1 choice, the *Order* will only protect NTELOS' bottom line and punish consumers.

V. Conclusion

For the reasons stated above, NTELOS' Opposition sets forth no valid argument in response to Virginia Cellular's Petition and, in any event, should be dismissed as untimely filed.

Respectfully submitted,



Russell D. Lukas
David A. LaFuria
Steven M. Chernoff
Lukas, Nace, Gutierrez & Sachs, Chartered
1111 19th Street, N.W.
Suite 1200
Washington, D.C. 20036
(202) 857-3500

Attorneys for Virginia Cellular, LLC

March 18, 2004

---

neither unfairly favor nor disfavor one technology over another").

CERTIFICATE OF SERVICE

I, Linda J. Evans, a secretary in the law office of Lukas, Nace, Gutierrez & Sachs, hereby certify that I have, on this 18th day of March, 2004, placed in the United States mail, first-class postage, prepaid, a copy of the foregoing *REPLY TO OPPOSITION* filed today to the following:

Elmer E. Halterman
General Manager
Highland Telephone Cooperative
Post Office Box 340
Monterey, Virginia 24465

K.L. Chapman, Jr.
President
New Hope Telephone Company
Post Office Box 38
New Hope, Virginia 24469

C. Douglas Wine
Manager
North River Telephone Cooperative
Post Office Box 236
Mt. Crawford, Virginia 22841-0236

Mr. L. Ronald Smith
President
Mountain Grove –Williamsville
Telephone Company
Post Office Box 105
Williamsville, Virginia 24487

Steven H. Goodman
NTELOS, Inc.
401 Spring Lane
Waynesboro, Virginia 22980

Christopher E. French
President
Shenandoah Telephone Company
Post Office Box 459
Edinburg, Virginia 22824

Thomas W. Sokol
State Executive – Virginia
Central Telephone Company
1108 East Main Street
Suite 1200
Richmond, Virginia 23219

Lydia R. Pulley
Vice President and General Counsel
Verizon South, Inc.
600 East Main Street
11th Floor
Richmond, Virginia 23219

Robert W. Woltz
President
Verizon Virginia, Inc.
Post Office Box 27241
600 East Main Street
Richmond, Virginia 23261

William Irby
Director, Communications Division
Virginia Corporation Commission
Post Office Box 1197
Richmond, Virginia 23218

Kathleen A. Cummings
Deputy Director, Communications
Div.
Virginia Corporation Commission
Post Office Box 1197
Richmond, Virginia 23218

Sheree King
Virginia Corporation Commission
Post Oiffice Box 1197
Richmond, Virginia 23218

*Chairman Michael K. Powell
Federal Communications Commission
445 12th Street, SW, Room 8-B201
Washington, D.C. 20554

*Commissioner Kathleen Q. Abernathy
Federal Communications Commission
445 12th Street, SW, Room 8-A204B
Washington, D.C. 20554

*Commissioner Michael J. Copps
Federal Communications Commission
445 12th Street, SW, Room 8-A302
Washington, D.C. 20554

*Commissioner Kevin J. Martin
Federal Communications Commission
445 12th Street, SW, Room 8-C302
Washington, D.C. 20554

*Commissioner Jonathan S. Adelstein
Federal Communications Commission
445 12th Street, SW, Room 8-C302
Washington, D.C. 20554

*Bryan Tramont, Senior Legal Advisor
Office of the Chairman
Federal Communications Commission
445 12th Street, SW, Room 8-B201
Washington, D.C. 20554

*Christopher Libertelli, Legal Advisor
Office of the Chairman
Federal Communications Commission
445 12th Street, SW, Room 8-B201
Washington, D.C. 20554

*Matthew Brill, Senior Legal Advisor
Office of Commissioner Abernathy
Federal Communications Commission
445 12th Street, SW, Room 8-A204B
Washington, D.C. 20554

*Jessica Rosenworcel, Legal Advisor
Office of Commissioner Copps
Federal Communications Commission
445 12th Street, SW, Room 8-A302F
Washington, D.C. 20554

*Daniel Gonzalez, Senior Legal Advisor
Office of Commissioner Martin
Federal Communications Commission
445 12th Street, SW, Room 8-C302
Washington, D.C. 20554

*Scott Bergman, Senior Legal Advisor
Office of Commissioner Adelstein
Federal Communications Commission
445 12th Street, SW, Room 8-C302
Washington, D.C. 20554

*William Maher, Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-C450
Washington, D.C. 20554

*Paul Garnett
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW, Room
Washington, D.C. 20054

*Thomas Buckley
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW, Room
Washington, D.C. 20054

*Romanda Williams
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-A321
Washington, D.C. 20554

*Eric Einhorn, Chief
Telecommunications Access Policy
Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-C360
Washington, D.C. 20554

*Narda Jones, Deputy Division Chief
Telecommunications Access Policy
Division
Wireline Competition Bureau Federal
Communications Commission
445 12th Street, SW, Room 5-B552
Washington, D.C. 20554

*Anita Cheng, Assistant Chief
Telecommunications Access Policy
Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW, Room 5-A445
Washington, D.C. 20554

Linda J. Evans

*Via e-mail